

Deficiency Progress Report

To complete the evaluation process, Cal/EPA requires the CUPAs to submit Deficiency Progress Reports that explain the CUPA's progress towards correcting the identified deficiencies. Deficiency Progress Reports are due every 90 days after the evaluation date until all deficiencies have been corrected.

CUPA: Healdsburg/Sebastopol Unified Program Agency
Evaluation Date: January 16 and 17, 2008
Evaluators: JoAnn Jaschke, CalEPA
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Date Update 1 submitted: March 31, 2008
Deficiencies corrected with update: 2 and 3
Remaining deficiencies that are in progress of being corrected: 1 and 5

Date Update 2 submitted: July 9, 2008
Deficiency corrected with update: 1
Remaining deficiency that is in progress of being corrected: 5

Deficiency 1: The CUPA is allowing businesses to submit Business Plans which are incomplete.

Preliminary Corrective Action(s): By April 16, 2008, the CUPA must submit an action plan outlining how the CUPA will maintain consistency among the business plans. The CUPA will also update Cal/EPA on the progress of the implementation of the action plan, until OES feels the deficiency has been corrected in the deficiency progress reports.

CUPA Corrective Action, (Update 1): Healdsburg/Sebastopol Unified Program Agency will have all business plans that are submitted be reviewed by the CUPA Program Manager for any deficiencies. This shall help maintain consistency of the business plans. If there are deficiencies it will be noted as a violation in CUPA DMS, or the violation will not be signed off as corrected and correspondence will be submitted to the business to correct the deficiencies. Once the business plan is completed to the satisfaction of the CUPA, the violation will be marked as corrected in CUPA DMS.

OES Response: OES accepts the plan and progress being made to correct this deficiency. OES will continue to monitor the progress being made to correct the deficiency via deficiency progress reports.

CUPA Corrective Action, (Update 2): Healdsburg/Sebastopol Unified Program Agency program manager has been reviewing Business Plans for consistency and completeness. The inventories are completed during the inspection process to ensure the reported quantities are correct. Manifests are reviewed on site to ensure that the hazardous waste being reported is correct. Business owners have been contacted about incomplete Business Plans and had to resubmit the completed plans. The Healdsburg/Sebastopol Unified Program Agency has been working with the other Sonoma County CUPA's on having businesses enter data into Unidocs. This will greatly improve the accurateness of the inventory data and the information is easily updated by the businesses.

OES Response: The corrective actions taken by the CUPA sufficiently correct this deficiency. No further updates are needed for this deficiency.

Deficiency 5: The CUPA is allowing the Healdsburg Fire Department (HFD) to operate its UST's without passing the annual monitoring certification and secondary containment test.

Preliminary Corrective Action(s): By March 17, 2008, the CUPA will develop a plan to bring the HFD into compliance. By September 17, 2008, the CUPA will ensure the HFD is in compliance and is operating with a valid permit.

CUPA Corrective Action, (Update 1): Healdsburg Certified Unified Program Agency developed and submitted a plan to Cal/EPA to bring Healdsburg Fire Department into compliance. After careful consideration, the decision was made to properly close the UST by removal. A scope of work plan for the tank closure project was completed and the Healdsburg Certified Unified Program Agency began implementing the plan. It is estimated that the closure of the underground tank will be completed by July 30, 2008.

SWRCB Response: The CUPA is making good progress towards correcting this deficiency. On the next deficiency progress report, please update us on the status of the closure.

CUPA Corrective Action, (Update 2): The Healdsburg Fire Department has installed a working temporary Above Ground Storage Tank (AGST) for the emergency generator. The bids for the tank removal will be awarded on July 9th, 2008. The bid award will have to be presented to the City Council for the final approval. The company who receives the bid award will have to schedule the removal of the tank. The estimated closure and removal for the underground tank is still July 30, 2008, but is dependant upon the company removing the underground storage tank.

SWRCB Response: The CUPA is making great progress towards correcting this deficiency. On the next deficiency progress report, please update us on the status of the closure.